

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MICHAEL COREY JENKINS, <i>et al</i>	:	
	:	
Plaintiffs,	:	
	:	Civil Action No.
v.	:	3:23-cv-374-ASH-DPJ
	:	
	:	
RANKIN COUNTY, MISSISSIPPI, <i>et al.</i>,	:	
	:	
Defendants.	:	

**PLAINTIFF MICHAEL JENKINS ANSWERS TO DEFENDANT'S FIRST
SET OF INTERROGATORIES**

Plaintiff reserves the right to amend, update and supplement these answers, subject to Federal Rules of Civil Procedure.

INTERROGATORY NO.1: Identify the name and, if known, the address and telephone number of each person you will or may call as a witness at the trial or hearing of this case, including by written statement, declaration, and/or affidavit, concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: No determination has yet been made as to the witnesses that may be called at trial or for a hearing. Such witnesses will be identified consistent with the court's scheduling order in that regard.

INTERROGATORY NO.2: Identify the name and, if known, the address and telephone number, of each person likely to have discoverable information concerning and/or relating

INTERROGATORY NO. 13: In full compliance with Fed. R. Civ. P. 26(a)(2), disclose any witness you may use to present evidence under Fed. R. Evid. 702, 703, or 705 in opposition to Sheriff Bailey's defense of qualified immunity.

ANSWER: Former Police Chief Thomas A. Tiderington.

I SOLEMNLY DECLARE AND AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE CONTENTS OF THE FOREGOING ANSWERS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

Respectfully submitted,

MICHAEL JENKINS

Respectfully submitted on November 22, 2024

/s/ Malik Z. Shabazz
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321-9540

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of November, I have electronically transmitted the foregoing Answers to Interrogatories to opposing counsel.

/s/Malik Z. Shabazz/s/

Malik Z. Shabazz Esq.

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Defendants.	:	

**PLAINTIFF EDDIE PARKER’S ANSWERS TO DEFENDANT’S FIRST
SET OF INTERROGATORIES**

Plaintiff reserves the right to amend, update and supplement these answers, subject to Federal Rules of Civil Procedure.

INTERROGATORY NO.1: Identify the name and, if known, the address and telephone number of each person you will or may call as a witness at the trial or hearing of this case, including by written statement, declaration, and/or affidavit, concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff’s Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff’s Bailey’s defense of qualified and/or your opposition to same.

ANSWER: No determination has yet been made as to the witnesses that may be called at trial or for a hearing. Such witnesses will be identified consistent with the court’s scheduling order in that regard.

INTERROGATORY NO.2: Identify the name and, if known, the address and telephone

INTERROGATORY NO. 13: In full compliance with Fed. R. Civ. P. 26(a)(2), disclose any witness you may use to present evidence under Fed. R. Evid. 702, 703, or 705 in opposition to Sheriff Bailey's defense of qualified immunity.

ANSWER: Former Police Chief Thomas A. Tiderington.

I SOLEMNLY DECLARE AND AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE CONTENTS OF THE FOREGOING ANSWERS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

Respectfully submitted,


EDDIE PARKER

Respectfully submitted on November 22, 2024

/s/ Malik Z. Shabazz

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**PLAINTIFF MICHAEL JENKINS ANSWERS TO DEFENDANT'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff's responses shall be continuing, and you are required to file reasonable supplemental responses to each request in the event new or additional information or documents are obtained or acquired.

REQUEST NO. 1: Produce all documents and/or tangible items identified in or that relate to, support, or contradict your responses to the interrogatories propounded by Sheriff Bailey and/or in your pre-discovery disclosures of core information.

ANSWER: All documents or tangible items identified in Plaintiff's answers to interrogatories and this Request for Production of Documents are included in this link: Court cases identified are public information and can be obtained on the ECF system.

REQUEST NO. 2: Produce all documents and/or tangible items, including digital copies of all photographs, audio and/or video recordings, concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: All documents or tangible items identified in Plaintiff's answers to interrogatory #2 are located at [Bates #1-308]

REQUEST NO. 3: Produce all documents which you will or may introduce at a trial or hearing of this cause related to Sheriff Bailey's defense of qualified immunity and/or your opposition to same.

ANSWER: All documents or tangible items identified in Plaintiff's answers to interrogatory #3 are located at [Bates # 1-427]

REQUEST NO. 4: Produce each and every written or recorded statement or witness account or notes made by or for any party or witness concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: All documents or tangible items identified in Plaintiff's answers to interrogatory #4 are located in the MBI Documents located at [Bates # 1-238]

REQUEST NO. 5: Produce each and every written report, correspondence, document, or tangible item in your possession or control concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: All documents or tangible items identified in Plaintiff's answers to interrogatories are provided at [Bates # 1-427]

REQUEST NO. 6: Produce a written report by any expert disclosed in response to Interrogatory No. 13, as well as all other documents required by Fed. R. Civ. P. 26(a)(2).

ANSWER: Plaintiff's expert report is forthcoming. Plaintiff's expert Thomas Tiderington's CV and litigation experience documents are provided at

DATED, this 22nd day of November, 2024.

Respectfully submitted on November 22, 2024

On behalf of Plaintiffs.

/s/ Malik Z. Shabazz

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/S/ TRENT WALKER ESQ

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**PLAINTIFF EDDIE PARKER ANSWERS TO DEFENDANT'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff's responses shall be continuing, and you are required to file reasonable supplemental responses to each request in the event new or additional information or documents are obtained or acquired.

REQUEST NO. 1: Produce all documents and/or tangible items identified in or that relate to, support, or contradict your responses to the interrogatories propounded by Sheriff Bailey and/or in your pre-discovery disclosures of core information.

ANSWER: All documents or tangible items identified in Plaintiff's answers to interrogatories and this Request for Production of Documents are included in this link: Court cases identified are public information and can be obtained on the ECF system.

REQUEST NO. 2: Produce all documents and/or tangible items, including digital copies of all photographs, audio and/or video recordings, concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: All documents or tangible items identified in Plaintiff's answers to interrogatory #2 are located at [Bates #1-308]

REQUEST NO. 3: Produce all documents which you will or may introduce at a trial or hearing of this cause related to Sheriff Bailey's defense of qualified immunity and/or your opposition to same.

ANSWER: All documents or tangible items identified in Plaintiff's answers to interrogatory #3 are located at [Bates # 1-427]

REQUEST NO. 4: Produce each and every written or recorded statement or witness account or notes made by or for any party or witness concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: All documents or tangible items identified in Plaintiff's answers to interrogatory #4 are located in the MBI Documents located at [Bates # 1-238]

REQUEST NO. 5: Produce each and every written report, correspondence, document, or tangible item in your possession or control concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: All documents or tangible items identified in Plaintiff's answers to interrogatories are provided at [Bates # 1-427]

REQUEST NO. 6: Produce a written report by any expert disclosed in response to Interrogatory No. 13, as well as all other documents required by Fed. R. Civ. P. 26(a)(2).

ANSWER: Plaintiff's expert report is forthcoming. Plaintiff's expert Thomas Tiderington's CV and litigation experience documents are provided at

[Bates # 309]

REQUEST NO. 7: Produce all documents reviewed by any expert whom you intend to call at the trial or hearing of this cause, including by declaration and/or affidavit.

ANSWER: Documents produced at Bates [308-427]

REQUEST NO. 8: Produce all documents containing words or phrases which contradict or rebut the defense of qualified immunity asserted by Sheriff Bailey.

ANSWER: Documents produced at Bates [1-427]

REQUEST NO. 9: Produce any and all document, including correspondence or form of communication, from Rankin County or its agents, representatives, and/or officers concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: Response to RPD Request #9 are located at [Bates # 1-308]

REQUEST NO. 10: Produce any and all documents, diary entries, notes, calendars, internal memoranda, correspondence, or other similar document or thing, whether generated by hand, computer entry, orally, recording, or by any other means, concerning and/or relating to (a) Sheriff Bailey and/or the Rankin County Sheriff's Department, (b) the allegations in your Complaint related to Sheriff Bailey, and/or (c) Sheriff's Bailey's defense of qualified and/or your opposition to same.

ANSWER: Plaintiff is not in possession of such items

DATED, this 22nd day of November, 2024.

Respectfully submitted on November 22, 2024

On behalf of Plaintiffs.

/s/ Malik Z. Shabazz

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